

RECEIVED

APR 29 2024

BY MAIL

United States District Court

For the

Eastern District of Missouri

_____)
Syreeta L. McNeal, Esq)
)
)
)
Plaintiff(s))
) Civil Action 4:23-cv-01732-Sep
)
Vera L Calvin, **Anthony T . Lofties**, Joann A. Jenkins)
Terrence B, Smith, Donovan R Frison, Melissa S. Scott- Chase)
Natavia T. Garner, Felicia B. Moore, Google LLC, Youtube LLC)
And Tik Tok, Inc.)
)
_____)

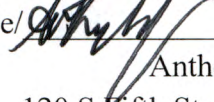
Defendant Motion to Dismiss Complaint/Case

1. Defendant move to dismiss for the following reasons: 1. Due to case is merely off of "He say, She Say". In statement "A" of plaintiff claims, Anthony Lofties used her information from being a subscriber and he contact people from St. Louis, MO. Plaintiff has present no exhibit to prove claim. Plaintiff accuse Defendant Anthony Lofties of contacting people from St. Louis, MO. Defendant did not provide any exhibits to prove her claim; 2. Plaintiff claim Mr. Lofties conspired with YouTube Content Creators publishing her full government name & information. No exhibits or proof to support those allegations. It's he say she say:
2. Defendant move to dismiss for the following reasons; 1. in statement "B" plaintiff say Mr. Lofties doxed her July 2023 per intelligence. What is per intelligence? No exhibit to prove claims. In the same paragraph plaintiff list the exact dates of what she claims other defendants did to her but when it related to Mr. Lofties there is no date; 4.
3. Defendant move to dismiss for the following reasons; in statement "C" plaintiff claims she visited YouTube content creator channel to discuss current events and analyze television show. Plaintiffs admit in paragraph "C" she provided her first initial and her last name and asked for

content creators to call her anonymous, but instead of having anonymous as her screen name, she used her government name. In paragraph "C" plaintiff states she would give public information regarding narcissism and public legal tools with family law court to help the public understand and spot behavioral traits of people exhibiting mental illness so they could learn how to set boundaries using her name on social media.

4. Defendant move to dismiss for the following reason In paragraph "IV" plaintiff state she believes the defendant Anthony Lofties and YouTube content creators are conspiring to dox, harass and threaten a federal attorney led by Anthony Lofties and When tay talk. No evidence/exhibit to support claims, keyword "plaintiff believes" plaintiff start her statement saying Mr. Lofties started everything now it change from one to two people. The story has change.
5. Defendant moves to dismiss for the following reason; Attach is the police report that was filed on 08/04/2023. Plaintiff story is different from the complaint the plaintiff filed with eastern Missouri court. Plaintiff states Anthony Lofties and Joann Jenkins from Washington DC hacked her and has given her information over the web, which nothing to prove those allegations and then change the names in the complaint to when tay talks. Everything in this case that pertains to my name is "He say, She say". The police officer that states in the report that Plaintiff sent an email and officer said exactly word or word what plaintiff sent in the email.
6. Defendant Anthony Lofties seek dismissal of this matter pursuant to Federal Rule of Civil Procedure 12(b)(6). Fed. R. Civ. P. 12(b)(6) provides for the dismissal of a case where the complaint fails to state a claim upon which relief can be granted.
7. When a Court is presented with a Rule 12(b)(6) motion, "it may consider the [complaint and any exhibits attached thereto, public records, items appearing in the record of the case and exhibits attached to the defendant's motion [for judgment on the pleadings, so long as they are referred to in the [complaint and are central to the claims contained therein." Bassett Nat'l Collegiate Athletic Ass'n, 528 F3d 426, 430 (6th Ci. 2008). The Court must construe these documents "in the light most favorable to the plaintiff, accept all factual allegations as true," and determine whether the plaintiff has alleged "enough factual matter" to "state a claim to relief that is plausible on its face." Cline v Rogers, 87 F3d 176, 179 (6th Cir 1996); Bell Atl Corp v Twombly, 550 U.S. 544, 556, (2007). The Court, however, "need not accept as true legal conclusions or unwarranted factual inferences" in the plaintiff complaint. Gregory v Shelby County, 220 F.3d 433, 446 (6th Cir 2000).
8. Plaintiff saying that Defendant is misleading the public. If you look at the transcript it's not misleading. They ask did you file a motion. It say process and filed, meaning a motion was sent. Plaintiff continues to make matters/situation something that it isn't.

9. Plaintiff continues to go through defendants comments and constantly make things about herself. The message she highlighted she is once again making it about her, not knowing if that message is about this case. Plaintiff needs to come with proof.
10. Defendants request that this Court grant their Motion to Dismiss for the above stated reasons, and those stated in the attached brief in support.
11. WHEREFORE Defendants request that this Court grant their Motion to Dismiss for the above stated reasons, and those stated in the attached brief in support.
12. Defendant Anthony Terral Lofties is asking for Court Hearing to be dismissed from this case.
13. Defendant Anthony Terral Lofties is asking to attend Court Hearing Via Virtual Zoom, due to not living in that state and never been to that area.

Pro Se/ 
Anthony Lofties
120 S Fifth Street, apt 406
Nashville, TN, 37206
ALTrioBusiness@gmail.com

Dated: April 25, 2024

Anthony Coftres
120 S Fifth St, Apt 406
Nashville, TN, 37206

CERTIFIED MAIL®

9589 0710 5270 1516 2976 15

RDC 99

NASHV, TN

25 APR 2024

RECEIVED

APR 29 2024

BY MAIL

U.S. District Court Clerk
111 South 10th ST
ST. Louis, MO, 63102

Motion for Hearing and Dismiss

63102-112599



63102

\$4.40
R2304M112438-5

U.S. POSTAGE PAID
FCM LETTER
ANTIOCH, TN 37013
APR 25, 2024

